

**NALVEN & SCHACHT**  
ATTORNEYS AT LAW

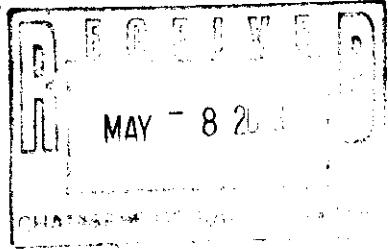
350 FIFTH AVENUE, SUITE 1422  
NEW YORK, NEW YORK 10118  
TELEPHONE: (212) 616-5540  
FACSIMILE: (212) 616-5543

PAUL R. NALVEN\*  
ALEXEI SCHACHT

\*MEMBER OF NEW YORK  
AND NEW JERSEY BARS

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT, E.D.N.Y.

★ MAY 15 2006 ★



**NEW JERSEY OFFICE**

70 SOUTH ORANGE AVENUE, SUITE 145  
LIVINGSTON, NEW JERSEY 07039  
TELEPHONE: (973) 655-1000  
FACSIMILE: (973) 992-0431

**BROOKLYN OFFICE**  
May 4, 2006

The Honorable John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Granted.*  
*Scheduled.*

s/John Gleeson

Re: United States v. Jenny Tobon, 03 Cr. 349 (JG)

*15-10-06*

Dear Judge Gleeson:

This law firm represents Jenny Tobon and I write to the Court to ask that she be given permission to retrieve her passport from the authorities for a 48-hour period so that she may apply for a New York State non-driver's license identification card. As a condition of her bail package, Ms. Tobon had to surrender her passport. The Court has previously granted her this same relief but several days ago Ms. Tobon lost her wallet and now has no identification at all. Therefore, she would like to have the chance to obtain new identification.

As always, thank you for considering this request.

Respectfully submitted,

Alexei Schacht

cc: A.U.S.A. Lee Freedman